

ATTACHMENT A: PRODUCTION FORMATS

- a) Production Components.** Unless otherwise stated below, productions shall include single page TIFFs, Text Files, an ASCII delimited metadata file (.txt, .dat, or .csv) and an image load file that can be loaded into commercially acceptable production software (e.g., Concordance).
- b) Load Files.** There will be two Load/Unitization Files accompanying all productions. One will be the image Load File and the other will be the Metadata Load File. Fielded data should be exchanged via a document-level-database Load File in one of two delimited formats: either standard Concordance (DAT) or comma delimited (CSV).
- a. Image Load File.
 - i. Image load files shall contain the following comma-delimited fields:
BEGBATES, VOLUME, IMAGE FILE PATH, DOCUMENT BREAK,
FOLDER BREAK, BOX BREAK, PAGE COUNT.
 - ii. Each TIFF in a production must be referenced in the corresponding image load file. The total number of pages referenced in a production's image load file should match the total number of TIFF files in the production.
 - iii. All image data should be delivered with a corresponding image Load File in one of three formats: standard IPro (LFP), Opticon (OPT) or Summation (DII).
 - iv. Every document referenced in the produced Load File shall have all corresponding images, text, and data logically grouped together in a directory structure with a common key to properly load the data.

- v. The name of the image Load File shall mirror the name of the delivery volume, and should have a lfp., opt, or .dii* extension (e.g., ABC001.lfp).
The volume names shall be consecutive (i.e., ABC001, ABC002, et. seq.)
*If a dii file is produced, the accompanying Metadata Load File shall be separate from the .dii file and not contained within the .dii file.
 - vi. The Load File shall contain one row per TIFF image.
 - vii. Every image in the delivery volume shall be contained in the image Load File.
 - viii. The image key shall be named the same as the Bates number of the page. Load files shall not span across media (e.g., CDs, DVDs, hard drives, etc.). A separate volume shall be created for each piece of media delivered.
- b. Metadata Fields and Metadata Load File.
- i. Each of the metadata and coding fields set forth below that can be extracted shall be produced for each document. The parties are not obligated to populate manually any of the fields below if such fields cannot be extracted from a document, with the exception of the following: BEGBATES, ENDBATES, BEGATTACH, ENDATTACH, and ALL CUSTODIANS. The metadata file shall be delimited according to the following characters:
 - 1. Delimiter = ¶ (ASCII:020)
 - 2. Text-Qualifier = þ (ASCII:254)
 - 3. New Line = ® (ASCII:174)

4. Multi-value delimiter = ; (ASCII Code 059)

Field Name	Field Description
BEGBATES	Beginning Bates number as stamped on the production image
ENDBATES	Ending Bates number as stamped on the production image
BEGATTACH	First production Bates number of the first document in a family
ENDATTACH	Last production Bates number of the last document in a family
ALL CUSTODIANS	Includes the Individual (Custodian) from whom the documents originated and all Individual(s) whose documents de-duplicated out (De-Duped Custodian).
SUBJECT	Subject line of email or short message
TITLE	Title from properties of document
DATESENT	Date email or short message was sent (format: MM/DD/YYYY)
TO	All recipients that were included on the “To” line of the email or short message
FROM	The name and email address of the sender of the email or short message
CC	All recipients that were included on the “CC” line of the email
BCC	All recipients that were included on the “BCC” line of the email
AUTHOR	Original composer of document or sender of email message or short message
FILENAME	Filename of an electronic document (Edoc or attachment)
DATEMOD	Date an electronic document was last modified or created (format: MM/DD/YYYY) (Edoc or attachment)
DATECREATED	Date the document was created (format: MM/DD/YYYY) (Edoc or attachment)
NATIVELINK	Native File Link (Native Files only)
TEXTLINK	Link to text files
CONFIDENTIALITY DESIGNATION	(As specified in Protective Order)

DATERCVD	Received date of an e-mail or short message (mm/dd/yyyy format) (a given e-mail or short message will have either a DateSent or Date Recvd, but not both)
FILEPATH	File path storage location of the document or e-mail or short message if the source application allows for the creation of folders. <i>Note: this field may be blank.</i>
FILEEXTENSION	File extension of native file
FILESIZE	File size in bytes
HASHVALUE	MD5 or SHA-1 hash value

ii. The total number of documents referenced in a production's data load file should match the total number of designated document breaks in the Image Load file(s) in the production.

iii. The total number of documents in a production should match the total number of records in the data load file.

c) **TIFFs.** Documents that exist only in hard copy format shall be scanned and produced as TIFFs. Unless excepted below, documents that exist as ESI shall be converted and produced as TIFFs. Unless excepted below, single page Group IV TIFFs should be provided, at least 300 dots per inch (dpi) for all documents. Each TIFF image shall be named according to a unique corresponding Bates number associated with the document. Each image shall be branded according to the Bates number and the agreed upon confidentiality designation. Original document orientation should be maintained (i.e., portrait to portrait and landscape to landscape). TIFFs shall show all text and images that would be visible to a user of the hard copy documents.

d) **Text Files.** A single multi-page text file shall be provided for each document, and the filename should match its respective TIFF filename. A commercially acceptable

technology for optical character recognition “OCR” shall be used for all scanned, hard copy documents. When possible, the text of native files should be extracted directly from the native file. Text files will not contain the redacted portions of the documents and the OCR text files will be substituted instead of extracted text files for redacted documents. All documents shall be produced with a link in the TextLink field.

- e) **Bates Numbering.** All images must be assigned a unique Bates number that is sequential within a given document and across the production sets.
- f) **Confidentiality Designation.** Responsive documents in TIFF format and TIFF placeholders for native format will be stamped with the appropriate confidentiality designations in accordance with the Protective Order in this matter.
- g) **Redaction of Information.** If documents are produced containing redacted information, an electronic copy of the original, unredacted data shall be securely preserved in such a manner so as to preserve without modification, alteration or addition the content of such data including any metadata therein.
- h) **Native Files.** Spreadsheets (e.g., MS Excel, Google Sheets) and delimited text files (e.g. comma-separated value (.csv) files and tab-separated value (.tsv) files) shall be produced in either their native format or MS Excel. TIFF images need not be produced unless the files have been redacted, in which instance such files shall be produced in TIFF with OCR Text Files. A TIFF placeholder indicating that the document was provided in native format should accompany the database record. If a file has been redacted, TIFF images and OCR text of the redacted document will suffice in lieu of a native file and extracted text.

- i) **Proprietary Files.** To the extent a response to discovery requires production of ESI accessible only through proprietary software, the parties should continue to preserve each version of such information. The parties shall meet and confer to finalize the appropriate production format.
- j) **Production Media.** Documents shall be encrypted and produced on external hard drives, readily accessible computer(s) or other electronic media, or via FTP or other equivalent file transmittal application (“Production Media”). Each piece of Production Media shall identify a production number corresponding to the production volume (e.g., “VOL001,” “VOL002”), as well as the volume of the material in that production (e.g. “-001,” “-002”). Each piece of Production Media shall also identify: (1) the producing party’s name; (2) the production date; (3) the Bates Number range of the materials contained on the Production Media; and (4) the set(s) of requests for production for which the documents are being produced.
- k) **Miscellaneous.** If particular Documents not described above warrant production in a different format, the parties will cooperate in a good faith effort to agree upon a mutually acceptable format and may produce the Documents in such format.